

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

BRADLEY CLONAN,  Plaintiff  v.  CentraState Healthcare System/Atlantic Health System; RWJBarnabas Health – Monmouth Medical Center; Hampton Behavioral Health Center, et al.  Defendants.	Civil Docket No.: 3:24-cv-11399-RK-RLS
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**MOTION OF DEFENDANT HAMPTON BEHAVIORAL HEALTH CENTER TO  
DISMISS PLAINTIFF’S COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6) AND  
FED. R. CIV. P. 12(b)(1)**

Defendant, Hampton Behavioral Health Center (collectively “Defendant”), respectfully moves to dismiss Plaintiff’s Complaint pursuant to Federal Rules of Civil Procedure 12(b)(6) and 12(b)(1), for the reasons set forth in the accompanying Memorandum of Law, which is incorporated herein by reference. For all of the reasons set forth in the accompanying Memorandum of Law, Defendant Hampton Behavioral Health Center requests that this Court dismiss Plaintiff’s Complaint against it, in its entirety, without leave to amend.

Respectfully submitted,

Date: January 24, 2025

By: /s/ Michael W. Bootier

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*Attorneys for Defendant, Hampton Behavioral  
Health Center*

**CERTIFICATE OF SERVICE**

I, Michael W. Bootier, Esquire hereby certify that a true and correct copy of the foregoing Motion to Dismiss was served via US mail, electronic mail, and/or this Court's electronic filing system upon the following on January 24, 2025:

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UHS of Doylestown, L.L.C. d/b/a Foundations Behavioral Health  
Amy Smith  
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***Co-Defendants***

Respectfully submitted,

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